

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

ASTRAZENECA AB, AKTIEBOLAGET  
HÄSSLE, ASTRAZENECA LP, KBI INC.,  
and KBI-E INC.,

Plaintiffs and  
Counterclaim-Defendants,  
v.

HANMI USA, INC., HANMI  
PHARMACEUTICAL CO., LTD., HANMI  
FINE CHEMICAL CO., LTD, and HANMI  
HOLDINGS CO., LTD.,

Defendants and  
Counterclaim-Plaintiffs.

Civil Action No. 3:11-CV-00760-JAP-TJB

Judge Joel A. Pisano  
Magistrate Judge Tonianne J. Bongiovanni

**DECLARATION OF MICHAEL E. FURROW IN SUPPORT OF PLAINTIFFS'  
RESPONSIVE *MARKMAN* BRIEF**

I, Michael E. Furrow, hereby declare as follows,

1. I am an associate at the law firm of Fitzpatrick, Cella, Harper & Scinto, 1290 Avenue of the Americas, New York, New York 10104-3800, counsel for Plaintiffs AstraZeneca AB, Aktiebolaget Hässle, AstraZeneca LP, KBI Inc., and KBI-E Inc. in connection with the present action.

2. I make this Declaration on my personal knowledge in support of Plaintiffs' Responsive *Markman* Brief.

3. Attached as Exhibit 1 is a true and correct copy of excerpts from the transcript of the December 6, 2011 deposition of Dr. Stephen G. Davies.

4. Attached as Exhibit 2 is a true and correct copy of excerpts from the transcript of the December 16, 2011 deposition of Dr. Jerry L. Atwood.

5. Attached as Exhibit 3 is a true and correct copy of an email from Renita S.

Rathinam, Esq. to Henry Renk, Esq., *et al.* sent on August 15, 2011, 11:48 AM.

6. Attached as Exhibit 4 is a true and correct copy of excerpts from Defendants' First Amended Non-Infringement and Invalidity Contentions Pursuant to L. Pat. R. 3.6 dated December 9, 2011.

7. Attached as Exhibit 5 is a true and correct copy of certain letters and emails exchanged by the parties between November 21, 2011 and December 27, 2011.

8. Attached as Exhibit 6 is a true and correct copy of a letter from Joshua I. Rothman, Esq. to John. B. Scherling, Esq. dated January 3, 2012.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 6, 2012



Michael E. Furrow